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PATENT

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Date: 1/10/06Casey L. Martin
Casey L. Martin**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re patent application of:

Applicant(s): Prasanna V. Krishnan, *et al.*

Examiner: Cam Y T. Truong

Serial No: 10/693,090

Art Unit: 2162

Filing Date: October 23, 2003

Title: PROMOTION AND DEMOTION TECHNIQUES TO FACILITATE FILE
PROPERTY MANAGEMENT BETWEEN OBJECT SYSTEMS

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

APPEAL BRIEF

Dear Sir:

Appellants' representative submits this brief in connection with an appeal of the above-identified patent application. A credit card payment form is filed concurrently herewith in connection with all fees due regarding this appeal brief. In the event any additional fees may be due and/or are not covered by the credit card, the Commissioner is authorized to charge such fees to Deposit Account No. 50-1063 [MSFTP536US].

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I. Real Party in Interest (37 C.F.R. §41.37(c)(1)(i))

The real party in interest in the present appeal is Microsoft Corporation, the assignee of the present application.

II. Related Appeals and Interferences (37 C.F.R. §41.37(c)(1)(ii))

Appellants, appellants' legal representative, and/or the assignee of the present application are not aware of any appeals or interferences which may be related to, will directly affect, or be directly affected by or have a bearing on the Board's decision in the pending appeal.

III. Status of Claims (37 C.F.R. §41.37(c)(1)(iii))

No claims have been cancelled or withdrawn. Claims 1-31 stand rejected by the Examiner. The rejection of claims 1-31 is being appealed.

IV. Status of Amendments (37 C.F.R. §41.37(c)(1)(iv))

No amendments have been entered subsequent the Final Office Action dated August 10, 2005.

V. Summary of Claimed Subject Matter (37 C.F.R. §41.37(c)(1)(v))**Independent Claim 1**

Independent claim 1 recites a computer implemented file transformation system, comprising: a file associated with one or more unstructured properties; an item that has one or more structured properties and is a structured object representation of the file; and a file property handler that manipulates at least one of the following: the unstructured properties based on changes to the structured properties and the structured properties based on changes to the unstructured properties. (*See e.g.*, pg. 2, ln. 15 – pg. 3, ln. 20; pg. 4, ll. 21-28; pg 5, ln. 10 – pg. 9, ln. 26; *see generally* Figs. 1 and 2).

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Independent Claim 14

Independent claim 14 recites a computer implemented system to facilitate data transformation that comprises means for exposing unstructured file properties to a structured store application, the unstructured file properties are related to a file that is an unstructured byte stream (*see e.g.*, pg. 5, ll. 14-28; pg. 7, ll. 3-15), means for transforming the unstructured file properties into structured item properties associated with the structured store application, the structured item properties are related to an item that is a structured object representation of the file (*see e.g.*, pg. 5, ln. 14 – pg. 7, ln. 2), and means for updating the structured item properties in the structured store application (*see e.g.*, pg. 8, ln. 27 – pg. 9, ln. 26).

The “means for” limitations described above are identified as limitations subject to the provisions of 35 U.S.C. §112 ¶6. The structures corresponding to these limitations are identified with reference to the specification and drawings in the above noted parentheticals.

Independent Claim 16

Independent claim 16 recites a computer implemented method to facilitate data item migration, comprising: modifying a file in a structured store namespace *via* utilizing a file API based application; and promoting one or more properties associated with the file to accordingly update properties associated with an item that is associated with the structured store namespace, the item is a structured object representation of the file in an object store. (*See e.g.*, pg. 10, ln. 8 – pg. 11, ln. 23; *see generally* Figs. 3-6).

Independent Claim 31

Independent claim 31 recites a computer readable medium having a data structure stored thereon, comprising: a first data field related to an unstructured property associated with file data; a second data field related to a structured property associated with item data, the item data is related to an item that is a structured object representation of a file, which is related to the file data; and a third data field that is employed to correlate the unstructured property data with the structured property data. (*See e.g.*, pg. 2, ln. 15 – pg. 3, ln. 20; pg. 4, ll. 21-28; pg. 5, ln. 10 – pg. 9, ln. 26).

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VI. Grounds of Rejection to be Reviewed (37 C.F.R. §41.37(c)(1)(vi))

A. Claims 1-3, 7 and 13 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bhatt *et al.* (U.S. 6,799,184) in view of Ohta *et al.* (U.S. 6,868,423).

B. Claims 4, 5, 6, 8, 9, and 12 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bhatt *et al.* (U.S. 6,799,184) in view of Ohta *et al.* (U.S. 6,868,423) and further in view of Inohara *et al.* (U.S. 6,385,606).

C. Claims 10 and 11 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bhatt *et al.* (U.S. 6,799,184) in view of Ohta *et al.* (U.S. 6,868,423) and further in view of Abdelnur *et al.* (U.S. 6,429,882).

D. Claims 14 and 15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bhatt *et al.* (U.S. 6,799,184) in view of Fitzsimons *et al.* (U.S. 6,708,189).

E. Claims 16, 18, 19, and 21 stand rejected under 35 U.S.C. §103(a) as being anticipated by Inohara *et al.* (U.S. 6,385,606) in view of Ohta *et al.* (U.S. 6,868,423).

F. Claims 17, 25-27, 29 and 30 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Inohara *et al.* (U.S. 6,385,606) in view of Ohta *et al.* (U.S. 6,868,423) and further in view of Bhatt *et al.* (US 6,799,184).

G. Claim 20 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Inohara *et al.* (U.S. 6,385,606) in view of Ohta *et al.* (U.S. 6,868,423) and further in view of Lee *et al.* (U.S. 6,061,696).

H. Claims 22 and 24 stand rejected under 35 U.S.C. §103(a) as being unpatentable Inohara *et al.* (US 6,385,606) in view of Ohta *et al.* (U.S. 6,868,423) and further in view of Fitzsimons *et al.* (U.S. 6,708,189).

I. Claim 23 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Inohara *et al.* (U.S. 6,385,606) in view of Ohta *et al.* (U.S. 6,868,423) and further in view of Ahluwalia (U.S. 6,728,685).

J. Claim 28 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Inohara *et al.* (U.S. 6,385,606) in view of Ohta *et al.* (U.S. 6,868,423) and further in view of Bhatt *et al.* (U.S. 6,799,184) and Fitzsimons *et al.* (U.S. 6,708,189).

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K. Claim 31 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Inohara *et al.* (U.S. 6,385,606) in view of Bhatt *et al.* (U.S. 6,799,184).

VII. Argument (37 C.F.R. §41.37(c)(1)(vii))

A. Rejection of Claims 1-3, 7 and 13 Under 35 U.S.C. §103(a)

Claims 1-3, 7 and 13 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bhatt *et al.* (U.S. 6,799,184) in view of Ohta *et al.* (U.S. 6,868,423). It is respectfully submitted that this rejection should be reversed for at least the following reasons. Bhatt *et al.* and Ohta *et al.*, individually or in combination, do not teach or suggest all the claim limitations of the subject claims.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. See *In re Vaack*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

The subject claims relate to manipulating unstructured properties associated with a file and/or structured properties associated with an item to enhance consistency between files and associated items when the structured properties or unstructured properties are updated independent of the other. (See pg. 4, ll. 17-20). More particularly, independent claim 1 recites a file associated with one or more unstructured properties; an *item* that has one or more structured properties and is a *structured object representation of the file*; and a *file property handler* that manipulates at least one of the following: the unstructured properties based on changes to the structured properties and the structured

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properties based on changes to the unstructured properties. Bhatt *et al.* and Ohta *et al.*, alone or in combination, fail to teach or suggest such claimed aspects.

Bhatt *et al.* does not teach or suggest an *item* that is a **structured object representation of the file**. The Final Office Action and Advisory Action contend that such aspects are disclosed in Bhatt *et al.* at figure 4A, column 11, lines 54-58 and column 13, lines 51-53 by stating that “Bhatt teaches a tree that has one or more nodes as attributes and is a structured object representation of the XML document. The tree is represented as an item.” (See Advisory Action dated October 27, 2005). Appellants’ representative avers to the contrary. Bhatt *et al.* discloses extracting, transforming, and persistently storing XML data in a relational database *via* employing an XML Store Engine, a Path Processor and an XQL Engine. (See col. 6, ll. 30-41). Bhatt *et al.* further notes that the “XML document is not stored with the transformed object” after the XML document is transformed. (See col. 15, ll. 9-10). It is stated that an XML Query Engine can be used to recompose the source document, but the document is not retained. (See col. 15, ll. 20-22). Bhatt *et al.* relates to extracting XML data from an XML document and removing the XML document; thus, the extracted XML data does not represent the XML document – instead, the extracted XML data is a replacement for the XML document. In contrast, the subject claim recites that the system includes both a *file* and an *item* that is a **structured object representation of the file**. Both the file and the item are utilized by the file property handler to perform the claimed manipulation such that a change to one or more properties associated with the file will result in a corresponding change to the properties associated with the item, and vice versa, which enhances consistency between a file and an associated item. Accordingly, Bhatt *et al.* fails to teach or suggest an item that is a structured object representation of the file.

As noted in the Final Office Action, Bhatt *et al.* does not teach or suggest “a file property handler that manipulates at least one of the following: the unstructured properties based on changes to the structured properties and the structured properties based on changes to the unstructured properties.” (See Final Office Action dated August 10, 2005, pg. 4). Furthermore, Bhatt *et al.* teaches away from such claimed aspects. In particular, Bhatt *et al.* notes that the XML document is not stored after the transformation is performed, as discussed above. Accordingly, properties associated with a file cannot

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be changed based on alterations made to the properties related to an item, and vice versa, if the file is removed (assuming, *arguendo*, that the XML document is a file associated with one or more unstructured properties as contended in the Final Office Action at page 3). Thus, Bhatt *et al.* teaches away from such claimed aspects; accordingly, there is no motivation to combine the teachings of Bhatt *et al.* with another reference to satisfy these claimed aspects.

Ohta *et al.* does not make up for the aforementioned deficiencies of Bhatt *et al.* *vis a vis* independent claim 1. In particular, Ohta *et al.* does not teach or suggest an item that is a structured object representation of the file as claimed. Ohta *et al.* relates to managing data formats by converting data aggregates into hierarchical unit trees. (See abstract). Ohta *et al.* discloses that the data aggregate is converted into a hierarchical unit tree of the XML format, and the data aggregate is decomposed into processing units. (See col. 2, ll. 32-37). However, Ohta *et al.* is silent regarding an item being a structured object representation of a file as recited in the claims. Instead, Ohta *et al.* notes that the hierarchical unit tree does not include data but reflects only a data structure. (See col. 9, ll. 8-9). Thus, Ohta *et al.* fails to teach or suggest such claimed aspects. Further, since Ohta *et al.* discloses that the hierarchical unit tree does not include data, it teaches away from an item being a structured object representation of the file.

Additionally, Ohta *et al.* does not teach or suggest a file property handler that manipulates at least one of the following: the unstructured properties based on changes to the structured properties and the structured properties based on changes to the unstructured properties as claimed. The Final Office Action asserts that such aspects are disclosed at column 7, lines 27-55. (See Final Office Action dated August 10, 2005, pg. 4). Appellants' representative disagrees with such contentions. Ohta *et al.* discloses that a hierarchical unit tree can be created from XML data, changes can be added to the hierarchical unit tree, and the XML data can be converted to reflect the change. (See col. 7, ll. 25-34). However, as noted above, Ohta *et al.* is silent regarding an item that has one or more structured properties and is a structured object representation of a file. Instead, Ohta *et al.* notes that the hierarchical unit tree only reflects a data structure (*e.g.*, a relationship between the attributes without including an attribute value) – the hierarchical unit tree does not include data. (See col. 9, ll. 8-9; col. 7, ll. 29-31). Thus, unstructured

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properties associated with a file are not manipulated based on changes to structured properties of an item, and vice versa.

In view of at least the foregoing, it is readily apparent that Bhatt *et al.* and Ohta *et al.*, alone or in combination, do not teach or suggest the subject invention as recited in independent claim 1 (and claims 2, 3, 7, and 13 which depend there from). This rejection should be reversed.

B. Rejection of Claims 4, 5, 6, 8, 9, and 12 Under 35 U.S.C. §103(a)

Claims 4, 5, 6, 8, 9, and 12 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bhatt *et al.* (U.S. 6,799,184) in view of Ohta *et al.* (U.S. 6,868,423) and further in view of Inohara *et al.* (U.S. 6,385,606). It is respectfully submitted that this rejection should be reversed for at least the following reasons. The cited references, individually or in combination, do not teach or suggest all inventive aspects set forth in the subject claims. In particular, Inohara *et al.* does not make up for the aforementioned deficiencies of Bhatt *et al.* and Ohta *et al.* with respect to independent claim 1 (which claims 4, 5, 6, 8, 9, and 12 depend from). Therefore, the subject invention as recited in claims 4, 5, 6, 8, 9, and 12 is not obvious over the combination of Bhatt *et al.*, Ohta *et al.* and Inohara *et al.* Thus, it is respectfully submitted that this rejection be reversed.

C. Rejection of Claims 10 and 11 Under 35 U.S.C. §103(a)

Claims 10 and 11 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bhatt *et al.* (U.S. 6,799,184) in view of Ohta *et al.* (U.S. 6,868,423) and further in view of Abdelnur *et al.* (U.S. 6,429,882). It is respectfully submitted that this rejection should be reversed for at least the following reasons. Bhatt *et al.*, Ohta *et al.* and Abdelnur *et al.*, individually or in combination, do not teach or suggest all the limitations set forth in the subject claims. In particular, Abdelnur *et al.* does not make up for the aforementioned deficiencies of Bhatt *et al.* and Ohta *et al.* with respect to independent claim 1 (which claims 10 and 11 depend from). Therefore, the subject invention as recited in claims 10 and 11 is not obvious over the cited art – this rejection should be reversed.

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D. Rejection of Claims 14 and 15 Under 35 U.S.C. §103(a)

Claims 14 and 15 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bhatt *et al.* (U.S. 6,799,184) in view of Fitzsimons *et al.* (U.S. 6,708,189). It is respectfully submitted that this rejection should be reversed for at least the following reasons. Bhatt *et al.* and Fitzsimons *et al.*, individually or in combination, do not teach or suggest all the claim limitations of the subject claims.

Independent claim 14 recites means for transforming the unstructured file properties into structured item properties associated with the structured store application, the structured item properties are related to an item that is a structured object representation of the file. As noted *supra*, Bhatt *et al.* fails to teach or suggest an *item that is a structured object representation of the file*. Additionally, Fitzsimons *et al.* fails to make up for the aforementioned deficiency of Bhatt *et al.* with regard to independent claim 14. Fitzsimons *et al.* relates to converting a data file received by an automated publishing system from a source for use within presentation spaces of an automated publishing system. (See abstract). Fitzsimons *et al.* discloses parsing a data file to recover an identifier associated with a source and information content that can be employed by the automated publishing system. (See col. 2, ll. 1-3). Fitzsimons *et al.*, however, is silent regarding an item that is a structured object representation of the file. Thus, Fitzsimons *et al.* fails to teach or suggest such claimed aspects.

In view of at least the foregoing, it is readily apparent that Bhatt *et al.* and Fitzsimons *et al.*, alone or in combination, do not teach or suggest the subject invention as recited in independent claim 14 (and claim 15 which depends there from). This rejection should be reversed.

E. Rejection of Claims 16, 18, 19, and 21 Under 35 U.S.C. §103(a)

Claims 16, 18, 19, and 21 stand rejected under 35 U.S.C. §103(a) as being anticipated by Inohara *et al.* (U.S. 6,385,606) in view of Ohta *et al.* (U.S. 6,868,423). It is respectfully submitted that this rejection should be reversed for at least the following reasons. Inohara *et al.* and Ohta *et al.*, individually or in combination, do not teach or suggest all the claim limitations of the subject claims.

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In particular, independent claim 16 recites promoting one or more properties associated with the file to accordingly update properties associated with an item that is associated with the structured store namespace, the item is a structured object representation of the file in an object store. The Final Office Action suggests that Inohara *et al.* discloses “promoting one or more properties associated with the file” and notes that Inohara *et al.* fails to teach or suggest “to accordingly update properties associated with an item that is associated with the structured store namespace, the item is a structured object representation of the file in an object store.” (See Final Office Action dated August 10, 2005, pg. 15).

The Final Office Action further asserts that Ohta *et al.* makes up for the deficiencies of Inohara *et al.*, which is again contended in the Advisory Action. Appellants’ representative disagrees with these assertions. As discussed above, Ohta *et al.* does not teach or suggest that an item is a structured object representation of a file. Additionally, Ohta *et al.* does not teach or suggest updating properties associated with an item based on properties associated with the file. Ohta *et al.* discloses that changes are made to the hierarchical unit tree, and then the XML data is converted to reflect the changes added to the hierarchical unit tree. (See col. 7, ll. 25-34). Ohta *et al.* further discloses that the hierarchical unit tree does not include data and instead only reflects a data structure. (See col. 9, ll. 8-9). Thus, Ohta *et al.* does not teach or suggest that the item is a structured object representation of the file in an object store since no data is included with the hierarchical unit tree. Moreover, assuming *arguendo* that the hierarchical unit tree is an item and the XML data is a file, Ohta *et al.* discloses updating the file based on changes to the item and not updating the item based on changes to the file. Thus, Ohta *et al.* fails to teach or suggest such claimed aspects.

In view of at least the foregoing, it is readily apparent that Inohara *et al.* and Ohta *et al.*, alone or in combination, do not teach or suggest the subject invention as recited in independent claim 16 (and claims 18, 19, and 21 which depend there from). This rejection should be reversed.

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F. Rejection of Claims 17, 25-27, 29 and 30 Under 35 U.S.C. §103(a)

Claims 17, 25-27, 29 and 30 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Inohara *et al.* (U.S. 6,385,606) in view of Ohta *et al.* (U.S. 6,868,423) and further in view of Bhatt *et al.* (US 6,799,184). It is respectfully submitted that this rejection should be reversed for at least the following reasons. The cited art, individually or in combination, do not teach or suggest each and every element set forth in the subject claims. In particular, Bhatt *et al.* does not make up for the aforementioned deficiencies of Inohara *et al.* and Ohta *et al.* with respect to independent claim 16 (which claims 17, 25-27, 29, and 30 depend from). Therefore, the subject invention as recited in claims 17, 25-27, 29, and 30 is not obvious over the combination of Inohara *et al.*, Ohta *et al.* and Bhatt *et al.* Thus, it is respectfully submitted that this rejection be reversed.

G. Rejection of Claim 20 Under 35 U.S.C. §103(a)

Claim 20 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Inohara *et al.* (U.S. 6,385,606) in view of Ohta *et al.* (U.S. 6,868,423) and further in view of Lee *et al.* (U.S. 6,061,696). It is respectfully submitted that this rejection should be reversed for at least the following reasons. Inohara *et al.*, Ohta *et al.* and Lee *et al.*, individually or in combination, do not teach or suggest each and every element set forth in the subject claim. In particular, Lee *et al.* does not make up for the aforementioned deficiencies of Inohara *et al.* and Ohta *et al.* with respect to independent claim 16 (which claim 20 depends from). Therefore, the subject invention as recited in claim 20 is not obvious over the combination of Inohara *et al.*, Ohta *et al.* and Lee *et al.* Thus, it is respectfully submitted that this rejection be reversed.

H. Rejection of Claims 22 and 24 Under 35 U.S.C. §103(a)

Claims 22 and 24 stand rejected under 35 U.S.C. §103(a) as being unpatentable Inohara *et al.* (US 6,385,606) in view of Ohta *et al.* (U.S. 6,868,423) and further in view of Fitzsimons *et al.* (U.S. 6,708,189). It is respectfully submitted that this rejection should be reversed for at least the following reasons. The cited references, individually or in combination, do not teach or suggest each and every element set forth in the subject claims. In particular, Fitzsimons *et al.* does not make up for the aforementioned

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deficiencies of Inohara *et al.* and Ohta *et al.* with respect to independent claim 16 (which claims 22 and 24 depend from). Therefore, the subject invention as recited in claims 22 and 24 is not obvious over the combination of Inohara *et al.*, Ohta *et al.* and Fitzsimons *et al.* Thus, it is respectfully submitted that this rejection be reversed.

I. Rejection of Claim 23 Under 35 U.S.C. §103(a)

Claim 23 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Inohara *et al.* (U.S. 6,385,606) in view of Ohta *et al.* (U.S. 6,868,423) and further in view of Ahluwalia (U.S. 6,728,685). It is respectfully submitted that this rejection should be reversed for at least the following reasons. The cited art, individually or in combination, do not teach or suggest each and every element set forth in the subject claim. In particular, Ahluwalia does not make up for the aforementioned deficiencies of Inohara *et al.* and Ohta *et al.* with respect to independent claim 16 (which claim 23 depends from). Therefore, the subject invention as recited in claim 23 is not obvious over the combination of Inohara *et al.*, Ohta *et al.* and Ahluwalia; and this rejection should be reversed.

J. Rejection of Claim 28 Under 35 U.S.C. §103(a)

Claim 28 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Inohara *et al.* (U.S. 6,385,606) in view of Ohta *et al.* (U.S. 6,868,423) and further in view of Bhatt *et al.* (U.S. 6,799,184) and Fitzsimons *et al.* (U.S. 6,708,189). It is respectfully submitted that this rejection should be reversed for at least the following reasons. The cited references, individually or in combination, do not teach or suggest each and every element set forth in the subject claim. In particular, Bhatt *et al.* and Fitzsimons *et al.* do not make up for the aforementioned deficiencies of Inohara *et al.* and Ohta *et al.* with respect to independent claim 16 (which claim 28 depends from). Therefore, the subject invention as recited in claim 28 is not obvious over the combination of Inohara *et al.*, Ohta *et al.*, Bhatt *et al.* and Fitzsimons *et al.* Thus, it is respectfully submitted that this rejection be reversed.

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K. Rejection of Claim 31 Under 35 U.S.C. §103(a)

Claim 31 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Inohara *et al.* (U.S. 6,385,606) in view of Bhatt *et al.* (U.S. 6,799,184). It is respectfully submitted that this rejection should be reversed for at least the following reasons. Inohara *et al.* and Bhatt *et al.*, individually or in combination, do not teach or suggest all the claim limitations of the subject claim.

Inohara *et al.* and Bhatt *et al.*, alone or in combination, do not teach or suggest that the item data is related to an item that is a structured object representation of a file, which is related to the file data as recited in independent claim 31. The Final Office Action notes that Inohara *et al.* does not teach or suggest "the item data is related to an item that is a structured object representation of a file, which is related to the file data." (See Final Office Action dated August 10, 2005, pg. 24). Additionally, Bhatt *et al.* fails to make up for the aforementioned deficiencies of Inohara *et al.* *vis a vis* independent claim 31. In particular, as noted above, Bhatt *et al.* does not teach or suggest that an item is a structured object representation of a file. Accordingly, Inohara *et al.* and Bhatt *et al.*, alone or in combination, do not teach or suggest such aspects recited in independent claim 31.

In view of at least the foregoing, it is readily apparent that Inohara *et al.* and Bhatt *et al.*, alone or in combination, do not teach or suggest the subject invention as recited in independent claim 31. This rejection should be reversed.

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L. Conclusion

For at least the above reasons, the claims currently under consideration are believed to be patentable over the cited references. Accordingly, it is respectfully requested that the rejections of claims 1-31 be reversed.

If any additional fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Respectfully submitted,
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VIII. Claims Appendix (37 C.F.R. §41.37(c)(1)(viii))

1. A computer implemented file transformation system, comprising:
a file associated with one or more unstructured properties;
an item that has one or more structured properties and is a structured object representation of the file; and
a file property handler that manipulates at least one of the following: the unstructured properties based on changes to the structured properties and the structured properties based on changes to the unstructured properties.
2. The system of claim 1, the file property handler performs at least one of an extraction and a transformation in order to promote the unstructured properties to the structured properties.
3. The system of claim 1, the file property handler performs at least one of an extraction and a transformation in order to demote the structured properties to the unstructured properties.
4. The system of claim 1, further comprising a file property manager to facilitate communications between applications working with unstructured property stream/file and applications working with a structured object representation of a file.
5. The system of claim 1, the file property handler facilitates a promotion operation when a file API based application modifies properties by updating a file stream for a structured object store item.
6. The system of claim 5, the structured object store item is a file-backed item.
7. The system of claim 1, the file property handler facilitates a demotion operation when an application queries for and modifies items employing a structured store Application Programming Interface (API) that manipulates a file-backed item.

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8. The system of claim 1, the file property handler is registered to process one or more selected file extensions.
9. The system of claim 4, the file property manager on receiving a notification of an unstructured byte stream representation of the file having been modified calls a file property handler for it with a pointer to the byte stream of the file to be promoted.
10. The system of claim 1, the file property handler is associated with an abstract class that defines methods for promotion and demotion.
11. The system of claim 10, the abstract class includes at least one of a BaseFilePropertyHandler, a promote method, a demote method, a first promote method, a store serialized item method, and a retrieve serialized item method.
12. The system of claim 1, further comprising an application programming interface (API) that allows applications to modify a file-backed item.
13. A computer readable medium having computer readable instructions stored thereon for implementing the file property handler of claim 1.
14. A computer implemented system to facilitate data transformation, comprising:
 - means for exposing unstructured file properties to a structured store application, the unstructured file properties are related to a file that is an unstructured byte stream;
 - means for transforming the unstructured file properties into structured item properties associated with the structured store application, the structured item properties are related to an item that is a structured object representation of the file; and
 - means for updating the structured item properties in the structured store application.
15. The system of claim 14, further comprising means for transforming the structured item properties into unstructured file properties.

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16. A computer implemented method to facilitate data item migration, comprising:
modifying a file in a structured store namespace *via* utilizing a file API based application; and
promoting one or more properties associated with the file to accordingly update properties associated with an item that is associated with the structured store namespace, the item is a structured object representation of the file in an object store.
17. The method of claim 16, further comprising demoting one or more properties associated with the item to be in accordance with the file API based application.
18. The method of claim 16, further comprising registering a file property handler to facilitate promoting or demoting the one or more properties.
19. The method of claim 16, further comprising de-queuing a change item.
20. The method of claim 16, further comprising retrieving a structured item for a selected item path.
21. The method of claim 16, further comprising morphing an item's type/structure or changing an item type/structure.
22. The method of claim 16, further comprising automatically extracting properties and updating an item.
23. The method of claim 16, further comprising marking modified parts of an item as promoted.
24. The method of claim 16, further comprising applying changes to the item in the object store.

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25. The method of claim 17, further comprising determining the item for updates to parts of the item.
26. The method of claim 17, further comprising querying an item store for a file property handler registration.
27. The method of claim 26, further comprising loading the file property handler into a cache.
28. The method of claim 17, further comprising automatically identifying fields to be updated.
29. The method of claim 17, further comprising reading changes from an item and updating file properties.
30. The method of claim 29, further comprising at least one of sending the item changes to the store and closing a stream.
31. A computer readable medium having a data structure stored thereon, comprising:
a first data field related to an unstructured property associated with file data;
a second data field related to a structured property associated with item data, the item data is related to an item that is a structured object representation of a file, which is related to the file data; and
a third data field that is employed to correlate the unstructured property data with the structured property data.

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IX. Evidence Appendix (37 C.F.R. §41.37(c)(1)(ix))

None.

X. Related Proceedings Appendix (37 C.F.R. §41.37(c)(1)(x))

None.